

EXHIBIT A



CORPORATION SERVICE COMPANY

Notice of Service of Process

TMM / ALL
Transmittal Number: 14662752
Date Processed: 01/12/2016

Primary Contact: WF West - WF Bank
Corporation Service Company- Wilmington, DELAWARE
2711 Centerville Road
Wilmington, DE 19808

Entity:	Wells Fargo Bank, National Association Entity ID Number 2013649
Entity Served:	Wells Fargo Bank, N.A.
Title of Action:	Cengiz Sengel vs. Wells Fargo Bank, N.A.
Document(s) Type:	Summons/Complaint
Nature of Action:	Contract
Court/Agency:	Riverside County Superior Court, California
Case/Reference No:	RIC 1515342
Jurisdiction Served:	California
Date Served on CSC:	01/11/2016
Answer or Appearance Due:	30 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	Elizabeth J. Arleo 858-674-6912
Client Requested Information:	Matter Management User Groups: [Service of Process]

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC
CSC is SAS70 Type II certified for its Litigation Management System.
2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | sop@cscinfo.com

SUM-100

SUMMONS (CITACION JUDICIAL)

NOTICE TO DEFENDANT: (AVISO AL DEMANDADO):

WELLS FARGO BANK, N.A., and DOES 1 through 10, inclusive

YOU ARE BEING SUED BY PLAINTIFF: (LO ESTÁ DEMANDANDO EL DEMANDANTE):

CENGIZ SENGEL

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

DEC 28 2015

F. Roa

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):

Riverside Historic Courthouse
4050 Main Street, Riverside, CA 92501

CASE NUMBER:
(Número del Caso):

RIC 1515342

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Elizabeth J. Arleo, 16870 W. Bernardo Dr., Suite 400, San Diego, CA 92127, Telephone: 858/674-6912

DATE:
(Fecha)

DEC 28 2015

Clerk, by
(Secretario)

F. Roa

, Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

(SEAL)

NOTICE TO THE PERSON SERVED: You are served

- ☐ as an individual defendant.
- ☐ as the person sued under the fictitious name of (specify):

- ☒ on behalf of (specify):

Wells Fargo Bank N.A.

- under: ☒ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):

- ☐ by personal delivery on (date):

1 ARLEO LAW FIRM, PLC
2 ELIZABETH J. ARLEO, SBN: 201730
3 16870 West Bernardo Drive, Suite 400
4 San Diego, CA 92127
5 Telephone: 858/674-6912
6 Facsimile: 760/789-8081
7 Email: elizabeth@arleolaw.com

8 Attorney for Plaintiff

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

DEC 28 2015

F. Roa

9 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **IN AND FOR THE COUNTY OF RIVERSIDE**

11 CENGIZ SENGEL,

12 Plaintiff,

13 v.

14 WELLS FARGO BANK, N.A., and DOES 1
15 through 10, inclusive

16 Defendants.

CASE NO. **RIC 1515342**

**COMPLAINT FOR VIOLATIONS OF
THE TELEPHONE CONSUMER
PROTECTION ACT, 47 U.S.C.
SECTIONS 227, et seq.**

JURY TRIAL DEMANDED

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COMPLAINT

1 Plaintiff, Cengiz Sengel ("Plaintiff"), alleges as follows against Defendant Wells Fargo
2 Bank, N.A. ("Defendant" or "Wells Fargo") and Does 1-10, inclusive ("Defendants") on
3 information and belief, unless otherwise indicated, formed after an inquiry reasonable under the
4 circumstances and which allegations are likely to have evidentiary support after an opportunity
5 for further investigation and discovery, as follows:

6 **GENERAL ALLEGATIONS**

7 1. This action arises out of violations of the Telephone Consumer Protection Act, 47
8 U.S.C. §§ 227, *et seq.*, ("TCPA") by Defendants.

9 2. The TCPA was enacted to protect individuals against harassment, annoyance and
10 loss from abusive use of automated telephone dialing systems. In 2008, Plaintiff began receiving
11 calls to and recorded messages left on Plaintiff's cellular telephones from the Defendants seeking
12 a call back from Plaintiff regarding his Wells Fargo credit card. To date, Plaintiff has received
13 hundreds of calls on his cellular telephones from Defendants.

14 3. During at least 30 of these calls, Defendants left artificial or prerecorded voice
15 messages on Plaintiff's cellular telephones.

16 4. Plaintiff has consistently received, and continues to receive, calls on his cellular
17 telephones from Defendants with these artificial or prerecorded voice messages.

18 5. Plaintiff did not consent, in any manner, to the receipt of these telephone calls or
19 the artificial or prerecorded voice messages left by the Defendants.

20 6. The persistent nuisance of Defendants' telephone calls constitutes an unlawful
21 invasion of Plaintiff's privacy.

22 7. The use of Defendants' name in this Complaint includes all agents, employees,
23 officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees,
24 representatives and insurers of each Defendant.

25 **PARTIES**

26 8. Plaintiff is, and at all times mentioned herein was, an individual citizen and
27 resident of the State of California, who resides in Riverside County, California. Plaintiff is, and at
28 all times mentioned herein was, a "person" as defined by 47 U.S.C. § 153(10).

1 9. Defendant Wells Fargo Bank, N.A. has its principal place of business at 101 N.
2 Phillips Avenue, Sioux Falls, South Dakota 57104. At all relevant times Wells Fargo has been, a
3 corporation with offices located throughout California including this County, and is registered to
4 do business in the State of California, with its agent for service of process located in Sacramento,
5 California.

6 10. Defendants are, and at all times mentioned herein, were corporations and "persons
7 as defined by 47 U.S.C. § 153(10).

8 11. At all times relevant Defendants conducted business in the State of California and
9 in the County of Riverside.

10 12. On multiple occasions over numerous days, all prior to the date this Complaint
11 was filed, but sometime after four years prior to the date this complaint was filed, Defendants
12 contacted Plaintiff on Plaintiff's cellular telephone via an "automatic telephone dialing system,"
13 as defined by 47 U.S.C. §227 (a)(1).

14 13. During these telephone calls Defendants used "an artificial or prerecorded voice"
15 as prohibited by 47 U.S.C. §227 (b)(1)(A).

16 14. The telephone numbers Defendants called were assigned to cellular telephone
17 services for which Plaintiff incurs a charge for incoming calls pursuant to 47 U.S.C. § 227 (b)(1).

18 15. These telephone calls constituted calls that were not for emergency purposes as
19 defined by 47 U.S.C. § 227 (b)(1)(A)(i).

20 16. Plaintiff Cengiz Sengel did not provide prior express consent to receive calls on
21 his cellular telephones, pursuant to 47 U.S.C. § 227 (b)(1)(A).

22 17. These telephone calls by Defendants violated 47 U.S.C. § 227(b)(1).

23 18. Defendants Does 1 through 10 are persons, corporations, partnerships or other
24 entities who have done or will do acts otherwise alleged in this complaint. Defendants Does 1
25 through 10, inclusive, at all times mentioned herein, have acted and are continuing to act in
26 concert with Wells Fargo, and each of them has participated in the acts and transactions referred
27 to below and each of them is responsible for said acts and transactions. The true names, roles and
28 capacities of Does 1 through 10, whether individual, corporate or otherwise, are unknown to

1 Plaintiff, who therefore sues said Defendants under such fictitious names, pursuant to the
2 provisions of Section 474 of the California Code of Civil Procedure.

3 19. At all times herein mentioned each of the Defendants sued herein as a Doe
4 Defendant was the agent or employee of each of the remaining Defendants, and was at all times
5 acting within the purpose and scope of such agency or employment.

6 **JURISDICTION AND VENUE**

7 20. This Court has jurisdiction over the TCPA causes of action asserted herein
8 pursuant to 47 U.S.C. § 227(b)(3).

9 21. This Court has jurisdiction over the Defendants named herein because each
10 Defendant is either a corporation organized and existing under the laws of the State of California
11 a corporation that does sufficient business in California, or is an individual who has sufficient
12 minimum contacts with California to render the exercise of jurisdiction by the California courts
13 permissible under traditional notions of fair play and substantial justice.

14 22. Venue is proper in this Court because one or more of the Defendants either
15 resides in or maintains offices in this County, a portion of the transactions and wrongs
16 complained of herein, including Defendants' primary participation in the wrongful acts detailed
17 herein as against Plaintiffs, occurred in this County, and Defendants have received substantial
18 compensation in this County by doing business here and engaging in numerous activities that had
19 an effect in this County.

20 23. Personal jurisdiction is proper because Defendants do substantial business in the
21 State of California.

22 **FACTUAL ALLEGATIONS**

23 24. In 2008, Defendants began calling Plaintiff's cellular telephone numbers,
24 including 626-419-XXXX and 626-644-XXXX, using an "artificial or prerecorded voice" as
25 prohibited by 47 U.S.C. § 227(b)(1)(A)(iii), directly to Plaintiff's cellular telephones.

26 25. Defendants' phone calls were made using an "automatic telephone dialing
27 system," as defined by 47 U.S.C. § 227(a)(1). The automatic telephone dialing system has the
28

1 capacity to store or produce telephone numbers to be called, using a random or sequential number
2 generator.

3 26. During these calls, Defendants used "an artificial or prerecorded voice" as
4 prohibited by 47 U.S.C. § 227(b)(1)(A).

5 27. Since the initial telephone calls in 2008, Defendants have repeatedly called
6 Plaintiff's cellular telephones for non-emergency purposes which is prohibited by 47 U.S.C. §
7 227(b)(1)(A)(iii).

8 28. To date, Plaintiff has received hundreds of calls on his cellular telephones from
9 Defendants. During at least 30 of these calls, Defendants left artificial or prerecorded voice
10 messages on Plaintiff's cellular telephone.

11 29. The telephone numbers Defendants called were assigned to cellular telephone
12 services for which Plaintiff incurred a charge for incoming calls pursuant to 47 U.S.C. §
13 227(b)(1).

14 30. The calls from Defendants using any automatic telephone dialing system and/or
15 an artificial or prerecorded voice to Plaintiff's cellular telephone were not placed for emergency
16 purposes or made with the prior express consent of Plaintiff as allowed by 47 U.S.C.
17 § 227(b)(1)(A).

18 31. Plaintiff did not provide his express consent to receive any calls from each of the
19 Defendants to receive call on his cellular telephones, pursuant to 47 U.S.C. § 227(b)(1)(A).

20 32. These telephone calls by Defendants violated 47 U.S.C. § 227(b)(1).

21 33. Plaintiff's action is timely. The applicable statute of limitations for violations of
22 TCPA is four years (28 U.S.C. § 1658(a)), this rule is subject to the "discovery rule."
23 Consequently, the time does not begin to run on actions brought under TCPA until the plaintiff
24 discovers or should have discovered his injury. Under the facts detailed herein, Plaintiff did not
25 learn until September 28, 2015, that his telephone conversations violated the TCPA.

26 34. On October 3, 2014, a class action lawsuit was filed on behalf of California-based
27 mortgage borrowers alleging TCPA violations against Wells Fargo Bank, N.A. in the United
28 States District Court for the Southern District of California entitled *Lillian Franklin v. Wells*

1 *Fargo Bank, N.A., et al.*, Case No. 14-cv-2349 MMA-BGS ("*Franklin*"). The *Franklin* complaint
 2 asserted, *inter alia*, claims under TCPA §§ 227, *et seq.* and identified the TCPA class as:

3 . . . all persons within the United States who received any telephone call from
 4 Defendant to said person's cellular telephone made through the use of any
 5 automatic telephone dialing system or an artificial or prerecorded voice, within the
 6 four years prior to the filing of this Complaint regarding the collections of alleged
 7 debts for Wells Fargo credit card accounts.

8 35. Plaintiff is or was properly a member of the proposed class in the *Franklin* class
 9 action. The Wells Fargo Defendants have been on notice of the *Franklin* class action since
 10 October 3, 2014, during which time the statute of limitations on the claims of the Plaintiff here
 11 have been tolled.

12 36. Wells Fargo and the *Franklin* plaintiff entered into a Settlement Agreement and
 13 release in November, 2014.

14 37. The *Franklin* settlement class is defined as:

15 All cell phone users or subscribers to wireless or cellular service within the United
 16 States who used or subscribed to phone numbers to which Wells Fargo placed any
 17 calls from November 1, 2009 to September 17, 2014 using any automated dialing
 18 technology or artificial or recorded voice technology in an effort to collect on a
 19 consumer credit card account.

20 38. On December 22, 2014, the *Franklin* plaintiff filed a motion for preliminary
 21 approval of the settlement agreement which was granted by the United States Court, Southern
 22 District of California on February 9, 2015. The motion for final approval of the settlement
 23 agreement has not been approved.

24 39. Plaintiff elected to be excluded from the *Franklin* Class Action Settlement.

25 CAUSE OF ACTION

26 Violations of the Telephone Consumer Protection Act: 47 U.S.C. Sections 227 *et seq.*

27 40. Plaintiff incorporates by reference all of the above paragraphs of this Complaint
 28 as though fully set forth herein.

41. Without prior express consent, Defendants contacted Plaintiff on his cellular
 telephone using an automatic telephone dialing system or an artificial or prerecorded voice, in
 violation of 47 U.S.C. § 227(b)(1)(A)(iii).

42. Defendants placed these calls knowing that they lacked consent to call Plaintiff. As such, each call placed to Plaintiff was made in knowing and/or willful violation of the TCPA, and is subject to treble damages pursuant to 47 U.S.C. § 227(b)(3)(C).

43. Plaintiff is informed and believes that the violations of 47 U.S.C. § 227(b)(1)(A)(iii) by Defendants were willful and in accordance with Defendants' standard business procedures. In the alternative, plaintiff is informed and believes that Defendants' violations of 47 U.S.C. § 227(b)(1)(A)(iii) were negligent.

44. As a result of each call made in negligent violation of the TCPA, Plaintiff is entitled to a minimum award of \$500.00 in statutory damages pursuant to 47 U.S.C. § 227(b)(3)(B).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays for judgment against Defendants:

A. Statutory damages in the amount of \$500.00 for each violation determined to be negligent pursuant to 47 U.S.C. § 227(b)(3)(B);

B. Treble damages for each violation determined to be willful and/or knowing pursuant to 47 U.S.C. § 227(b)(3)(C);

C. Injunctive relief pursuant to 47 U.S.C. § 227(b)(3)(A) and prospective injunctive relief on behalf of the general public requiring Defendants to comply with the above cited provisions of the TCPA;

D. Attorney's fees and costs pursuant to California Code of Civil Procedure § 1021.5; and

E. Such other and further relief as may be just and proper.

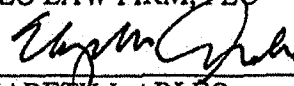
TRIAL BY JURY

Plaintiff is entitled to and demands a trial by jury for all claims so triable.

Respectfully submitted,

DATED: December 24, 2015

ARLEO LAW FIRM, PLLC


ELIZABETH J. ARLEO

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16870 West Bernardo Drive, Suite 400
San Diego, CA 92127
Telephone: 858/674-6912
Facsimile: 760/789-8081
Email: elizabeth@arleolaw.com

Attorney for Plaintiff

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Elizabeth J. Arleo, SBN: 201730 ARLEO LAW FIRM, PLC 16870 West Bernardo Drive, Suite 400 San Diego, CA 92127 TELEPHONE NO.: 858/674-6912 FAX NO.: 760/789-8081 ATTORNEY FOR (Name): Plaintiff, Cengiz Sengel		FOR COURT USE ONLY					
SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE STREET ADDRESS: 4050 Main Street MAILING ADDRESS: CITY AND ZIP CODE: Riverside, CA 92501 BRANCH NAME: Historic Courthouse							
CASE NAME: Cengiz Sengel v. Wells Fargo Bank, N.A., et al.							
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; padding: 5px;"> CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less) </td> <td style="width: 40%; padding: 5px;"> Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402) </td> <td style="width: 30%; padding: 5px;"> CASE NUMBER: <div style="font-size: 1.2em; font-weight: bold;">RIC 1515342</div> </td> </tr> <tr> <td colspan="2"></td> <td style="padding: 5px;"> JUDGE: DEPT: </td> </tr> </table>			CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	CASE NUMBER: <div style="font-size: 1.2em; font-weight: bold;">RIC 1515342</div>		
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		JUDGE: DEPT:					

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:		
Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/W/D (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/W/D (23) Non-PI/PD/W/D (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/W/D tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input checked="" type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☐ punitive
4. Number of causes of action (specify): Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq.
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: December 24, 2015

ELIZABETH J. ARLEO

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE
4050 Main Street
Riverside, CA 92501
www.riverside.courts.ca.gov

NOTICE OF DEPARTMENT ASSIGNMENT
AND CASE MANAGEMENT CONFERENCE (CRC 3.722)

SENGEL VS WELLS FARGO BANK

CASE NO. RIC1515342

This case is assigned to the Honorable Judge John D. Molloy in Department 03 for all purposes.

The Case Management Conference is scheduled for 06/27/16 at 8:30 in
Department 03.

The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who
are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP section 170.6 shall be filed in accordance with that section.

Requests for accommodations can be made by submitting Judicial Council form MC-410 no fewer than
five court days before the hearing. See California Rules of Court, rule 1.100.

CERTIFICATE OF MAILING

I certify that I am currently employed by the Superior Court of California, County of Riverside, and that I
am not a party to this action or proceeding. In my capacity, I am familiar with the practices and
procedures used in connection with the mailing of correspondence. Such correspondence is deposited
in the outgoing mail of the Superior Court. Outgoing mail is delivered to and mailed by the United States
Postal Service, postage prepaid, the same day in the ordinary course of business. I certify that I served
a copy of the foregoing NOTICE on this date, by depositing said copy as stated above.

Court Executive Officer/Clerk

Date: 12/29/15

by:


FREDDY M ROA Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

☐ BANNING 311 E. Ramsey St., Banning, CA 92220
☐ BLYTHE 265 N. Broadway, Blythe, CA 92225
☐ HEMET 880 N. State St., Hemet, CA 92543
☐ MORENO VALLEY 13800 Heacock St., Ste. D201, Moreno Valley, CA 92553

☐ MURRIETA 30755-D Auld Rd., Suite 1226, Murrieta, CA 92563
☐ PALM SPRINGS 3255 E. Tahquitz Canyon Way, Palm Springs, CA 92262
☒ RIVERSIDE 4050 Main St., Riverside, CA 92501
☐ TEMECULA 41002 County Center Dr., #100, Temecula, CA 92591

RI-030

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar Number and Address) Elizabeth J. Arleo, SBN: 201730 ARLEO LAW FIRM, PLC 16870 West Bernardo Drive, Suite 400 San Diego, CA 92127 TELEPHONE NO: 858/674-6912 FAX NO. (Optional): 760/789-8081 E-MAIL ADDRESS (Optional): elizabeth@arleoalaw.com ATTORNEY FOR (Name): Plaintiff, Cengiz Sengel	FOR COURT USE ONLY FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF RIVERSIDE DEC 28 2015 F. Roa
PLAINTIFF/PETITIONER: CENGIZ SENDEL	
DEFENDANT/RESPONDENT: WELLS FARGO BANK, N.A., et al.	CASE NUMBER: RIC 1515342
CERTIFICATE OF COUNSEL	

The undersigned certifies that this matter should be tried or heard in the court identified above for the reasons specified below:

- ☐ The action arose in the zip code of: _____
- ☐ The action concerns real property located in the zip code of: _____
- ☒ The Defendant resides in the zip code of: 92501

For more information on where actions should be filed in the Riverside County Superior Courts, please refer to Local Rule 1.0015 at www.riverside.courts.ca.gov.

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date December 24, 2015

ELIZABETH J. ARLEO
 (TYPE OR PRINT NAME OF ☐ ATTORNEY ☐ PARTY MAKING DECLARATION)


 (SIGNATURE)

CM-015

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Elizabeth J. Arleo (SBN 201730) ARLEO LAW FIRM, PLC 16870 West Bernardo Drive, Suite 400 San Diego, CA 92127 TELEPHONE NO.: 858-674-6912 FAX NO. (Optional): 760-789-8081 E-MAIL ADDRESS (Optional): elizabeth@arleolaw.com ATTORNEY FOR (Name): Plaintiff Cengiz Sengel	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Riverside STREET ADDRESS: 4050 Main Street MAILING ADDRESS: CITY AND ZIP CODE: Riverside, CA 92501 BRANCH NAME: RIVERSIDE JUDICIAL DISTRICT	
PLAINTIFF/PETITIONER: Cengiz Sengel DEFENDANT/RESPONDENT: Wells Fargo Bank, N.A.	CASE NUMBER: RIC1515342 JUDICIAL OFFICER: John D. Molloy
NOTICE OF RELATED CASE	DEPT.: 3

Identify, in chronological order according to date of filing, all cases related to the case referenced above.

1. a. Title: Cengiz Sengel et al. v. Wells Fargo Bank, N.A. et al.
 b. Case number: Lead Case No. RIC 1408829
 c. Court: ☒ same as above
☐ other state or federal court (name and address):
 d. Department: 6
 e. Case type: ☐ limited civil ☒ unlimited civil ☐ probate ☐ family law ☐ other (specify):
 f. Filing date: September 4, 2014
 g. Has this case been designated or determined as "complex?" ☐ Yes ☒ No
 h. Relationship of this case to the case referenced above (check all that apply):
☒ involves the same parties and is based on the same or similar claims.
☒ arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
☐ involves claims against, title to, possession of, or damages to the same property.
☒ is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
☐ Additional explanation is attached in attachment 1h
 i. Status of case:
☒ pending
☐ dismissed ☐ with ☐ without prejudice
☐ disposed of by judgment
2. a. Title: Cengiz Sengel et al. v. Wells Fargo Bank, N.A. et al.
 b. Case number: Case No. 1410815
 c. Court: ☒ same as above
☐ other state or federal court (name and address):
 d. Department: 6

CM-015

PLAINTIFF/PETITIONER: Cengiz Sengel	CASE NUMBER:
DEFENDANT/RESPONDENT: Wells Fargo Bank, N.A.	RIC1515342

2. (continued)

- e. Case type: ☐ limited civil ☒ unlimited civil ☐ probate ☐ family law ☐ other (specify):
- f. Filing date: November 12, 2014
- g. Has this case been designated or determined as "complex?" ☐ Yes ☒ No
- h. Relationship of this case to the case referenced above (check all that apply):
- ☒ involves the same parties and is based on the same or similar claims.
 - ☒ arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
 - ☐ involves claims against, title to, possession of, or damages to the same property.
 - ☒ is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
 - ☐ Additional explanation is attached in attachment 2h
- i. Status of case:
- ☒ pending
 - ☐ dismissed ☐ with ☐ without prejudice
 - ☐ disposed of by judgment

3. a. Title:

b. Case number:

c. Court: ☐ same as above☐ other state or federal court (name and address):

d. Department:

e. Case type: ☐ limited civil ☐ unlimited civil ☐ probate ☐ family law ☐ other (specify):

f. Filing date:

g. Has this case been designated or determined as "complex?" ☐ Yes ☐ No

h. Relationship of this case to the case referenced above (check all that apply):

- ☐ involves the same parties and is based on the same or similar claims.
- ☐ arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
- ☐ involves claims against, title to, possession of, or damages to the same property.
- ☐ is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
- ☐ Additional explanation is attached in attachment 3h

i. Status of case:

- ☐ pending
- ☐ dismissed ☐ with ☐ without prejudice
- ☐ disposed of by judgment

4. ☐ Additional related cases are described in Attachment 4. Number of pages attached: _____

Date: January 7, 2016

Elizabeth J. Arleo

(TYPE OR PRINT NAME OF PARTY OR ATTORNEY)



(SIGNATURE OF PARTY OR ATTORNEY)

CM-015

PLAINTIFF/PETITIONER: Cengiz Sengel	CASE NUMBER:
DEFENDANT/RESPONDENT: Wells Fargo Bank, N.A.	RIC1515342

**PROOF OF SERVICE BY FIRST-CLASS MAIL
NOTICE OF RELATED CASE**

(NOTE: You cannot serve the Notice of Related Case if you are a party in the action. The person who served the notice must complete this proof of service. The notice must be served on all known parties in each related action or proceeding.)

1. I am at least 18 years old and not a party to this action. I am a resident of or employed in the county where the mailing took place, and my residence or business address is (specify):

16870 West Bernardo Drive, Suite 400, San Diego, CA 92127

2. I served a copy of the *Notice of Related Case* by enclosing it in a sealed envelope with first-class postage fully prepaid and (check one):

- a. ☒ deposited the sealed envelope with the United States Postal Service.
b. ☐ placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

3. The *Notice of Related Case* was mailed:

- a. on (date): January 7, 2016
b. from (city and state): San Diego, California

4. The envelope was addressed and mailed as follows:

- | | |
|---|---|
| a. Name of person served:
Loren W. Coe, SEVERSON & WERSON
Street address: 19100 Von Karman Ave #700
City: Irvine
State and zip code: CA 92612 | c. Name of person served:
Jeremy S. Golden, GOLDEN & CARDONA-LOYA
Street address: 3130 Bonita Road, Suite 200-B
City: Chula Vista
State and zip code: CA91910 |
|---|---|

- b. Name of person served:

Street address:
City:
State and zip code:

- d. Name of person served:

Street address:
City:
State and zip code:

☐ Names and addresses of additional persons served are attached. (You may use form POS-030(P).)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: January 7, 2016

Elizabeth J. Arleo

(TYPE OR PRINT NAME OF DECLARANT)


(SIGNATURE OF DECLARANT)